

# Exhibit A

**King County**[Home](#)[News](#)[Services](#)[Comments](#)[Search](#)**ECR Online**

SUPERIOR COURT CLERK'S OFFICE

[Home](#) | [Logout](#) | [Help](#)

All Documents																																													
<div> <div>My Account Info</div> <div> Pages Remaining: 1027  <a href="#">Buy More</a> </div> <div> Pages Selected: 0  Reports Selected: 0  Amount Remaining: 154.05  Amount Purchased: 525.00 </div> </div>																																													
<div> <div>INSTRUCTIONS</div> <div> <p>1) Select the documents you wish to purchase by checking the box to the left of the Sub #.</p> <p>2) Click on the Get Document button.</p> </div> </div>																																													
<div> <div> <div>All Documents</div> <div>Viewable</div> </div> <div> <div>Case Number: 11-2-35376-1</div> <div>Case Title: HOLLAND VS ER SOLUTIONS</div> <div>Filter By: <span>- All -</span></div> </div> <table border="1"> <thead> <tr> <th>Select</th> <th>Sub #▲</th> <th>Pages</th> <th>Date</th> <th>Description</th> </tr> </thead> <tbody> <tr> <td><input checked="" type="checkbox"/></td> <td>1</td> <td>8</td> <td>10/12/2011</td> <td>COMPLAINT FOR DAMAGES</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>2</td> <td>6</td> <td>10/12/2011</td> <td>SET CASE SCHEDULE</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>3</td> <td>3</td> <td>10/12/2011</td> <td>CASE INFORMATION COVER SHEET</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>4</td> <td>18</td> <td>10/12/2011</td> <td>SEALED FINANCIAL DOCUMENT(S)</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>5</td> <td>2</td> <td>10/14/2011</td> <td>SUMMONS</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>6</td> <td>1</td> <td>10/14/2011</td> <td>AFFIDAVIT/DCLR/CERT OF SERVICE</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>7</td> <td>2</td> <td>10/21/2011</td> <td>NOTICE OF APPEARANCE /DEF</td> </tr> </tbody> </table> <div>Get Document(s)</div> </div>						Select	Sub #▲	Pages	Date	Description	<input checked="" type="checkbox"/>	1	8	10/12/2011	COMPLAINT FOR DAMAGES	<input checked="" type="checkbox"/>	2	6	10/12/2011	SET CASE SCHEDULE	<input checked="" type="checkbox"/>	3	3	10/12/2011	CASE INFORMATION COVER SHEET	<input checked="" type="checkbox"/>	4	18	10/12/2011	SEALED FINANCIAL DOCUMENT(S)	<input checked="" type="checkbox"/>	5	2	10/14/2011	SUMMONS	<input checked="" type="checkbox"/>	6	1	10/14/2011	AFFIDAVIT/DCLR/CERT OF SERVICE	<input checked="" type="checkbox"/>	7	2	10/21/2011	NOTICE OF APPEARANCE /DEF
Select	Sub #▲	Pages	Date	Description																																									
<input checked="" type="checkbox"/>	1	8	10/12/2011	COMPLAINT FOR DAMAGES																																									
<input checked="" type="checkbox"/>	2	6	10/12/2011	SET CASE SCHEDULE																																									
<input checked="" type="checkbox"/>	3	3	10/12/2011	CASE INFORMATION COVER SHEET																																									
<input checked="" type="checkbox"/>	4	18	10/12/2011	SEALED FINANCIAL DOCUMENT(S)																																									
<input checked="" type="checkbox"/>	5	2	10/14/2011	SUMMONS																																									
<input checked="" type="checkbox"/>	6	1	10/14/2011	AFFIDAVIT/DCLR/CERT OF SERVICE																																									
<input checked="" type="checkbox"/>	7	2	10/21/2011	NOTICE OF APPEARANCE /DEF																																									

[King County](#) | [News](#) | [Services](#) | [Comments](#) | [Search](#)

Links to external sites do not constitute endorsements by King County.  
By visiting this and other King County web pages,  
you expressly agree to be bound by terms and conditions of the site.  
[The details.](#)

Build: 1.0.0.40.2  
Environment: Production

FILED

11 OCT 12 PM 1:35

KING COUNTY  
SUPERIOR COURT CLERK  
SEATTLE, WA.

JAY V. WHITE

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
FOR King COUNTYDwight Holland,

Plaintiff(s),

vs.

ER Solutions,

Defendant(s).

11-2-35376-1 KNT  
NO.

## COMPLAINT

COMES NOW the Plaintiff, Dwight Holland, and alleges as follows:

## I.

JURISDICTION1.1 At all times relevant hereto, Plaintiff was a resident of King County, WA.1.2 At all times relevant hereto, Defendant was a [ ] resident of King County, WA, believed to be residing at 800 SW 39th STREET, Renton, WA, or [ ] doing business in King County, WA.1.3 The events and transactions complained of herein occurred in King County, WA.

## II.

## PARTIES

2.1 At the time of the alleged acts herein, Plaintiff was a resident of King County.

2.2 At the time of the acts, breaches and/or omissions alleged herein, and at all times relevant hereto, Defendant EP Solutions is believed to have been [ ] single; or [ ] married to JANE DOE \_\_\_\_\_ and as such constitute a marital community under the laws of the State of Washington and all acts and omissions and/or negligence alleged herein were performed on behalf of and for the benefit of the marital community., or [ ] a business licensed by the State of Washington and doing businesss in said State.

## III.

## FACTUAL ALLEGATIONS

3.1 Please refer to Attached Affidavit Exhibit A. &  
At A

3.2 \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

3.3 \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

3.4 \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
(See Exhibit A for additional Allegations)

## IV

DEMAND FOR DAMAGES AND/OR RELIEF

4.1 As a direct and proximate result of the acts alleged herein, Plaintiff, has suffered economic damage in the amount of: \$ 3000.<sup>00</sup>.

4.2 Plaintiff has further been damaged by: Reformation / Standard. And  
FRAUD. Under US Code of Appeals, Filed 2004.

4.3 Case # 91-7142 J. STEVENSON V. TRW April 1, 1993

4.4 U.S. Code Chapter 63 §1341 FRAUD & Schemes

WHEREFORE, Plaintiff prays:

## V.

RELIEF SOUGHT

5.1 For an award of damages compensating Plaintiff for Pain And ACQUASH  
Emotional suffering \$45,000 Thousand Dollars on fees.

5.2 For an award of damages compensating Plaintiff for Punitive Damages  
\$130,000 One Hundred Thirty Thousand Dollars and fees.

5.3 For such other and further relief as the Court may deem just and equitable.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge and belief.

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

PLACE: \_\_\_\_\_

\_\_\_\_\_  
Plaintiff(S)

Presented by:

  
\_\_\_\_\_  
Plaintiff(s)

325 S. Wright Ave S.  
\_\_\_\_\_  
Address  
Kent, WA 98032  
\_\_\_\_\_

206-2909760  
\_\_\_\_\_  
Telephone

**IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
FOR KING COUNTY**

DWIGHT M. HOLLAND  
C/O  
325 Washington ave. South  
ste. #332  
Kent, WA 98032

Plaintiff

Vs.

ER SOLUTIONS, INC.  
800 w 39<sup>TH</sup> Street  
Renton, WA  
98057

Defendant

**AFFIDAVIT**

BEFORE ME, the undersigned Notary, Cathy L. Wyckoff, on  
this 8<sup>th</sup> day of OCTOBER, 2011. Personally appeared  
Dwight M. Holland, known to me to be a credible person and of lawful age  
who being by me first duly sworn, on his oath, deposes and says:  
I am the sole Beneficiary and Executor of the Legal Person/Entity known as DWIGHT MICHAEL HOLLAND.

1. I am the Petitioner in this matter and have personal knowledge of the matters herein referred to.
2. I'm a senior web developer, and worked my craft for 14 years, and well established in the community where I live and in good standing.
3. On July 7, 2011 I received a collection letter from ER Solution (Exhibit A1). The defendant letter stated it's collecting on the behalf of Dish Network an outstanding debt. The defendant also claimed I owe an alleged debt of \$117.03, and it instructed me to call to make arrangements for payment for said debt.
4. On July 14<sup>th</sup>, 2011, after receiving numerous of phone calls from the Defendant to my cell phone, I decided to call and inform the defendant to cease all phone communications.
5. On July 14<sup>th</sup>, 2011 approximately 2:02 pm, I called the defendant, wanting to instruct the Defendant to cease all telephone calls. Before I could state my request to the representative over the phone, the representative needed to identify me. The representative for the Defendant asked me two questions. My name and address. I told him my name 'Dwight Holland and my address was 325 Washington Avenue, South, Kent, WA'. From that point, the representative had my account and I proceeded with my request.

I have stated my request to both the representative and the manager (I believe his name to be Mr. Gordon). Mr. Gordon assured me the phone calls would cease, that did not happen.

6. On August 2<sup>nd</sup>, 2011 I sent the Defendant a validation of debt letter (Exhibit A2), as pursuant to, Federal laws, under Fair Debt Collection Practices Act, Fair Credit Billing Act. My letter wasn't a refusal to pay the debt, but it was a request to the Defendant to produce the proof of the debt instrument, which after all is my right to ask.

7. According to Federal laws, under Fair Debt Collection Practices Act, Fair Credit Billing Act, once a debt collector received a letter of debt validation, requesting validation of alleged debt, all collections activities MUST CEASE until the debt instrument can be produced. If the Debt Collector fails to produce the debt instrument, the debt collector must cease all debt collection action. This has not happened, as a matter of fact, the Defendant stepped up their collection attempts, as listed in this affidavit.

8. The Defendant ignored my request, and continued with unsolicited calls to my cell phone.

9. On August 12, 2011 Capital one sent me a letter in response to a request for credit increase (Exhibit A3). I applied for an increase in credit with Capital One, whom, I have a long time business relationship and I am in good standing with the company (Exhibit A4). I was surprised to receive a letter of denial, from them, because my credit scores are pretty decent, the least which is 684 with Experian. This event had me to check my credit reports and their scores. I've checked all three credit reporting agencies, Equifax, Experian and Transunion. What I've found was an unlawful, illegal derogatory comment on my credit report with two credit agencies, Experian and Equifax made by the Defendant.

10. The unlawful and illegal statement made by the Defendant about the Plaintiff to the above mention credit agencies, had reduced my score with both credit agencies, the worst being Experian, from 684 to 652. This was the culprit, that had done me damage, and made me look like a bad credit risk to a long time vendor Capital One. It's not secret, we live in a weak economy, and it just makes good business sense to protect your investments. Capital one was doing just that.

11. Whether it was negligence or ineptness of the Defendant, which has unlawful and illegally caused me harm/damage in this matter. The Defendant's filing of alleged debt unlawfully has damaged the Plaintiff credit rating, and the Plaintiff's good name in the world of commerce, which impeded the Plaintiff to conduct commerce, as he would normally.

12. I suffered emotional distress of embarrassment, disbelief, outrage of feeling helplessness, and feel robbed of my good standing in the commercial world, by the Defendant's unlawful actions.

13. Upon this discovery of the derogatory statement reported by the Defendant, I immediately sent a letter to both credit agencies Equifax and Experian (Exhibit A5, A6 respectively), to dispute the unlawful



derogatory mark initiated by the Defendant on to my credit report.

14. On August 2<sup>nd</sup>, 2011 – I sent the Defendant a notice of intent to file a lawsuit (Exhibit A7). Informing the Defendant it has deliberately violated my rights under Federal laws, - Fair Debt Collection Practices Act, Fair Credit Billing Act, and caused me harm- Defamation. The letter demanded the Defendant to remove the derogatory statement of my credit report, and all collection actions ceased immediately. The letter also extended administrative option to the Defendant in order to resolve the problem, thus avoiding the costly expense of court. Apparently, the Defendant remained silent on the issue, is why we are here today.

15. On August 22<sup>nd</sup>, 2011 the Defendant has responded to the Plaintiff's letter of intent (Exhibit A8). The Defendant has removed the admitted unlawful and slanderous remark from my credit report, and as proof attached a universal data form (Exhibit A9).

16. The Defendant's letter (Exhibit A8) gave poor excuses as to why it has violated the law and plain my original letter of debt validation (Exhibit A9) as a scapegoat. In short the Defendants reasons were, my letter didn't have the correct account number or address, and that my name 'Dwight Holland' was very common.

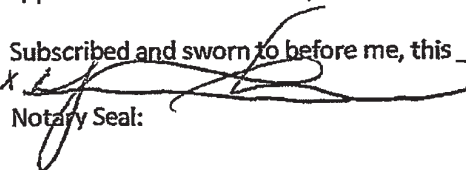
17. On August 24<sup>th</sup>, I've responded (Exhibit A10) to the defendant's allegations of poor information as an excuse violating my rights under the law, and thus causing me damage, economically and through defamation. My response to them, their allegations of the lack of information weren't true. I informed them, that on July 14<sup>th</sup>, I've called and with the same two pieces of information (My name 'Dwight Holland' and my address '325 Washington ave so' etc) the representative didn't have any problems locating my account. Additionally I have attached an old bill from the client they're represent – Dish Network (exhibit A11) and it has both my 'Dwight Holland' and the address '325 Washington ave South'. To date, they haven't responded, to deny the fact.

18. My letter (Exhibit A10) also, gave the Defendant another opportunity to settle this unfortunately event out of court. They have remained silent on the matter. Therefore, I have no choice but to seek litigation for damages and relief.

19. Once my credit was restored, and the scores were as before the unfortunate and unlawful event, I applied for two credit cards, and I have received both, no hassle (Exhibit 12).

Subscribed and sworn to before me, this 8<sup>th</sup> day of OCTOBER 2011

Notary Seal:



CATHY L. WYCKOFF

NOTARY PUBLIC

STATE OF WASHINGTON

MY COMMISSION EXPIRES 5-22-2012

NOTARY PUBLIC

My commission expires:

05/22, 2012

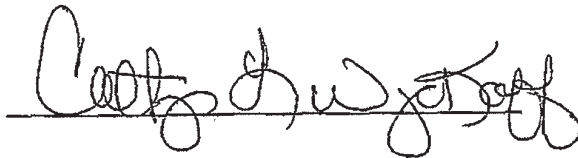
CERTIFICATE OF SERVICE

UNDER PENALTY OF PERJURY, I CERTIFY that a copy of the foregoing was provided by certify  
U.S. mail to  
ER Solutions, INC 800 SW 39<sup>th</sup> Street  
PO Box 9004  
Renton, WA 98057

this 8<sup>th</sup> day of October 2011

Notary Seal:


CATHY L WYCKOFF  
NOTARY PUBLIC  
STATE OF WASHINGTON  
MY COMMISSION EXPIRES 5-22-2012



NOTARY PUBLIC

My commission expires:

05/22 2012



DWIGHT MICHAEL HOLLAND, defendant pro se  
GENERAL DELIVERY  
KENT, WASHINGTON 98032  
206-290-94600

FILED  
 11 OCT 12 PM 1:37  
 KING COUNTY  
 SUPERIOR COURT CLERK  
 SEATTLE, WA.

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
 IN AND FOR THE COUNTY OF KING

DWIGHT HOLLAND

NO. 11-2-35376-1 KNT

Order Setting Civil Case Schedule (\*ORSCS)

vs

Plaintiff(s)

ER SOLUTIONS

ASSIGNED JUDGE White 8

FILE DATE: 10/12/2011

Defendant(s)

TRIAL DATE: 04/01/2013

A civil case has been filed in the King County Superior Court and will be managed by the Case Schedule on Page 3 as ordered by the King County Superior Court Presiding Judge.

I. NOTICES

**NOTICE TO PLAINTIFF:** The Plaintiff may serve a copy of this **Order Setting Case Schedule (Schedule)** on the Defendant(s) along with the **Summons and Complaint/Petition**. Otherwise, the Plaintiff shall serve the **Schedule** on the Defendant(s) within 10 days after the later of: (1) the filing of the **Summons and Complaint/Petition** or (2) service of the Defendant's first response to the **Complaint/Petition**, whether that response is a **Notice of Appearance**, a response, or a Civil Rule 12 (CR 12) motion. The **Schedule** may be served by regular mail, with proof of mailing to be filed promptly in the form required by Civil Rule 5 (CR 5).

*"I understand that I am required to give a copy of these documents to all parties in this case."*

*Dwight Holland*

Print Name

*[Signature]*

Sign Name

Order Setting Civil Case Schedule (\*ORSCS)

REV. 12/08 1

**I. NOTICES (continued)****NOTICE TO ALL PARTIES:**

All attorneys and parties should make themselves familiar with the King County Local Rules [KCLR] -- especially those referred to in this *Schedule*. In order to comply with the *Schedule*, it will be necessary for attorneys and parties to pursue their cases vigorously from the day the case is filed. For example, discovery must be undertaken promptly in order to comply with the deadlines for joining additional parties, claims, and defenses, for disclosing possible witnesses [See KCLCR 26], and for meeting the discovery cutoff date [See KCLCR 37(g)].

**CROSSCLAIMS, COUNTERCLAIMS AND THIRD PARTY COMPLAINTS:**

A filing fee of \$230 must be paid when any answer that includes additional claims is filed in an existing case.

**KCLCR 4.2(a)(2)**

A Confirmation of Joinder, Claims and Defenses or a Statement of Arbitrability must be filed by the deadline in the schedule. The court will review the confirmation of joinder document to determine if a hearing is required. If a Show Cause order is issued, all parties cited in the order must appear before their Chief Civil Judge.

**PENDING DUE DATES CANCELED BY FILING PAPERS THAT RESOLVE THE CASE:**

When a final decree, judgment, or order of dismissal of all parties and claims is filed with the Superior Court Clerk's Office, and a courtesy copy delivered to the assigned judge, all pending due dates in this *Schedule* are automatically canceled, including the scheduled Trial Date. It is the responsibility of the parties to 1) file such dispositive documents within 45 days of the resolution of the case, and 2) strike any pending motions by notifying the bailiff to the assigned judge.

Parties may also authorize the Superior Court to strike all pending due dates and the Trial Date by filing a *Notice of Settlement* pursuant to KCLCR 41, and forwarding a courtesy copy to the assigned judge. If a final decree, judgment or order of dismissal of all parties and claims is not filed by 45 days after a *Notice of Settlement*, the case may be dismissed with notice.

**If you miss your scheduled Trial Date**, the Superior Court Clerk is authorized by KCLCR 41(b)(2)(A) to present an *Order of Dismissal*, without notice, for failure to appear at the scheduled Trial Date.

**NOTICES OF APPEARANCE OR WITHDRAWAL AND ADDRESS CHANGES:**

*All parties to this action must keep the court informed of their addresses.* When a Notice of Appearance/Withdrawal or Notice of Change of Address is filed with the Superior Court Clerk's Office, parties must provide the assigned judge with a courtesy copy.

**ARBITRATION FILING AND TRIAL DE NOVO POST ARBITRATION FEE:**

A Statement of Arbitrability must be filed by the deadline on the schedule if the case is subject to **mandatory arbitration** and service of the original complaint and all answers to claims, counterclaims and cross-claims have been filed. If mandatory arbitration is required after the deadline, parties must obtain an order from the assigned judge transferring the case to arbitration. **Any party filing a Statement must pay a \$220 arbitration fee.** If a party seeks a trial de novo when an arbitration award is appealed, a fee of \$250 and the request for trial de novo must be filed with the Clerk's Office Cashiers.

**NOTICE OF NON-COMPLIANCE FEES:**

All parties will be assessed a fee authorized by King County Code 4.71.050 whenever the Superior Court Clerk must send notice of non-compliance of schedule requirements and/or Local Civil Rule 41.

**King County Local Rules are available for viewing at [www.kingcounty.gov/courts/clerk](http://www.kingcounty.gov/courts/clerk).**

## II. CASE SCHEDULE

CASE EVENT	DEADLINE or EVENT DATE	Filing Needed
Case Filed and Schedule Issued.	Wed 10/12/2011	*
Last Day for Filing Statement of Arbitrability without a Showing of Good Cause for Late Filing [See KCLMAR 2.1(a) and Notices on Page 2]. <b>\$220 arbitration fee must be paid</b>	Wed 03/21/2012	*
<b>DEADLINE</b> to file Confirmation of Joinder if not subject to Arbitration. [See KCLCR 4.2(a) and Notices on Page 2].	Wed 03/21/2012	*
<b>DEADLINE</b> for Hearing Motions to Change Case Assignment Area. [See KCLCR 82(e)]	Wed 04/04/2012	
<b>DEADLINE</b> for Disclosure of Possible Primary Witnesses [See KCLCR 26(b)].	Mon 10/29/2012	
<b>DEADLINE</b> for Disclosure of Possible Additional Witnesses [See KCLCR 26(b)].	Mon 12/10/2012	
<b>DEADLINE</b> for Jury Demand [See KCLCR 38(b)(2)].	Mon 12/24/2012	*
<b>DEADLINE</b> for Setting Motion for a Change in Trial Date [See KCLCR 40(e)(2)].	Mon 12/24/2012	*
<b>DEADLINE</b> for Discovery Cutoff [See KCLCR 37(g)].	Mon 02/11/2013	
<b>DEADLINE</b> for Engaging in Alternative Dispute Resolution [See KCLCR 16(b)].	Mon 03/04/2013	
<b>DEADLINE</b> for Exchange Witness & Exhibit Lists & Documentary Exhibits [See KCLCR 4(j)].	Mon 03/11/2013	
<b>DEADLINE</b> to file Joint Confirmation of Trial Readiness [See KCLCR 16(a)(2)].	Mon 03/11/2013	*
<b>DEADLINE</b> for Hearing Dispositive Pretrial Motions [See KCLCR 56; CR 56].	Mon 03/18/2013	
Joint Statement of Evidence [See KCLCR (4)(k)].	Mon 03/25/2013	*
<b>DEADLINE</b> for filing Trial Briefs, Proposed Findings of Fact and Conclusions of Law and Jury Instructions (Do not file Proposed Findings of Fact and Conclusions of Law with the Clerk)	Mon 03/25/2013	*
Trial Date [See KCLCR 40].	Mon 04/01/2013	

## III. ORDER

Pursuant to King County Local Civil Rule 4 [KCLCR 4], IT IS ORDERED that the parties shall comply with the schedule listed above. Penalties, including but not limited to sanctions set forth in Local Civil Rule 4(g) and Rule 37 of the Superior Court Civil Rules, may be imposed for non-compliance. It is FURTHER ORDERED that the party filing this action must serve this *Order Setting Civil Case Schedule* and attachment on all other parties.

DATED: 10/12/2011



PRESIDING JUDGE



#### **IV. ORDER ON CIVIL PROCEEDINGS FOR ASSIGNMENT TO JUDGE**

##### **READ THIS ORDER BEFORE CONTACTING YOUR ASSIGNED JUDGE**

This case is assigned to the Superior Court Judge whose name appears in the caption of this case schedule. The assigned Superior Court Judge will preside over and manage this case for all pretrial matters.

**COMPLEX LITIGATION:** If you anticipate an unusually complex or lengthy trial, please notify the assigned court as soon as possible.

**APPLICABLE RULES:** Except as specifically modified below, all the provisions of King County Local Civil Rules 4 through 26 shall apply to the processing of civil cases before Superior Court Judges. The local civil rules can be found at <http://www.kingcounty.gov/courts/superiorcourt/civil.aspx>.

##### **CASE SCHEDULE AND REQUIREMENTS**

Deadlines are set by the case schedule, issued pursuant to Local Civil Rule 4.

**THE PARTIES ARE RESPONSIBLE FOR KNOWING AND COMPLYING WITH ALL DEADLINES IMPOSED BY THE COURT'S LOCAL CIVIL RULES.**

##### **A. Joint Confirmation regarding Trial Readiness Report:**

No later than twenty one (21) days before the trial date, parties shall complete and file (with a copy to the assigned judge) a joint confirmation report setting forth whether a jury demand has been filed, the expected duration of the trial, whether a settlement conference has been held, and special problems and needs (e.g. interpreters, equipment, etc.).

The form is available at <http://www.kingcounty.gov/courts/superiorcourt.aspx>. If parties wish to request a CR 16 conference, they must contact the assigned court. Plaintiff's/petitioner's counsel is responsible for contacting the other parties regarding said report.

##### **B. Settlement/Mediation/ADR**

a. Forty five (45) days before the trial date, counsel for plaintiff/petitioner shall submit a written settlement demand. Ten (10) days after receiving plaintiff's/petitioner's written demand, counsel for defendant/respondent shall respond (with a counter offer, if appropriate).

b. Twenty eight (28) days before the trial date, a Settlement/Mediation/ADR conference shall have been held. **FAILURE TO COMPLY WITH THIS SETTLEMENT CONFERENCE REQUIREMENT MAY RESULT IN SANCTIONS.**

**C. Trial:** Trial is scheduled for 9:00 a.m. on the date on the case schedule or as soon thereafter as convened by the court. The Friday before trial, the parties should access the King County Superior Court website <http://www.kingcounty.gov/courts/superiorcourt.aspx> to confirm trial judge assignment. Information can also be obtained by calling (206) 205-5984.

#### **MOTIONS PROCEDURES**

##### **A. Noting of Motions**

**Dispositive Motions:** All summary judgment or other dispositive motions will be heard with oral argument before the assigned judge. The moving party must arrange with the hearing judge a date and time for the hearing, consistent with the court rules. Local Civil Rule 7 and Local Civil Rule 56 govern procedures for summary judgment or other motions that dispose of the case in whole or in part. The local civil rules can be found at <http://www.kingcounty.gov/courts/superiorcourt/civil.aspx>.

**Nondispositive Motions:** These motions, which include discovery motions, will be ruled on by the assigned judge without oral argument, unless otherwise ordered. All such motions must be noted for a date by which the ruling is requested; this date must likewise conform to the applicable notice requirements. Rather than noting a time of day, the Note for Motion should state "Without Oral Argument." Local Civil Rule 7 governs these motions, which include discovery motions. The local civil rules can be found at <http://www.kingcounty.gov/courts/superiorcourt/civil.aspx>.

**Motions in Family Law Cases not involving children:** Discovery motions to compel, motions in limine, motions relating to trial dates and motions to vacate judgments/dismissals shall be brought before the assigned judge. All other motions should be noted and heard on the Family Law Motions calendar. Local Civil Rule 7 and King County Family Law Local Rules govern these procedures. The local rules can be found at <http://www.kingcounty.gov/courts/superiorcourt/civil.aspx>.

**Emergency Motions:** Under the court's local civil rules, emergency motions will be allowed only upon entry of an Order Shortening Time. However, emergency discovery disputes may be addressed by telephone call and without written motion, if the judge approves.

## **B. Original Documents/Working Copies/ Filing of Documents**

**All original documents must be filed with the Clerk's Office.** Please see information on the Clerk's Office website at [www.kingcounty.gov/courts/clerk](http://www.kingcounty.gov/courts/clerk) regarding the new requirement outlined in LGR 30 that attorneys must e-file documents in King County Superior Court. The exceptions to the e-filing requirement are also available on the Clerk's Office website.

The working copies of all documents in support or opposition must be marked on the upper right corner of the first page with the date of consideration or hearing and the name of the assigned judge. The assigned judge's working copies must be delivered to his/her courtroom or the Judges' mailroom. Working copies of motions to be heard on the Family Law Motions Calendar should be filed with the Family Law Motions Coordinator. On June 1, 2009 you will be able to submit working copies through the Clerk's office E-Filing application at [www.kingcounty.gov/courts/clerk](http://www.kingcounty.gov/courts/clerk).

**Service of documents.** E-filed documents may be electronically served on parties who opt in to E-Service within the E-Filing application. The filer must still serve any others who are entitled to service but who have not opted in. E-Service generates a record of service document that can be e-filed. Please see information on the Clerk's office website at [www.kingcounty.gov/courts/clerk](http://www.kingcounty.gov/courts/clerk) regarding E-Service.

**Original Proposed Order:** Each of the parties must include an original proposed order granting requested relief with the working copy materials submitted on any motion. Do not file the original of the proposed order with the Clerk of the Court. Should any party desire a copy of the order as signed and filed by the judge, a pre-addressed, stamped envelope shall accompany the proposed order.

**Presentation of Orders:** All orders, agreed or otherwise, must be presented to the assigned judge. If that judge is absent, contact the assigned court for further instructions. If another judge enters an order on the case, counsel is responsible for providing the assigned judge with a copy.

**Proposed orders finalizing settlement and/or dismissal by agreement of all parties shall be presented to the assigned judge or in the Ex Parte Department. Formal proof in Family Law cases must be scheduled before the assigned judge by contacting the bailiff, or formal proof may be entered in the Ex Parte Department. If final order and/or formal proof are entered in the Ex Parte Department, counsel is responsible for providing the assigned judge with a copy.**

**C. Form**

Memoranda/briefs for matters heard by the assigned judge may not exceed twenty four (24) pages for dispositive motions and twelve (12) pages for nondispositive motions, unless the assigned judge permits over-length memoranda/briefs in advance of filing. Over-length memoranda/briefs and motions supported by such memoranda/briefs may be stricken.

**IT IS SO ORDERED. FAILURE TO COMPLY WITH THE PROVISIONS OF THIS ORDER MAY RESULT IN DISMISSAL OR OTHER SANCTIONS. PLAINTIFF/PEITITONER SHALL FORWARD A COPY OF THIS ORDER AS SOON AS PRACTICABLE TO ANY PARTY WHO HAS NOT RECEIVED THIS ORDER.**



---

**PRESIDING JUDGE**



FILED

FILED  
11 OCT 12 PM 1:37  
KING COUNTY  
SUPERIOR COURT CLERK  
SEATTLE, WA.

KING CO SUPERIOR CT  
BARBARA MINER  
DIRECTOR & SUP CRT CLERK  
SEATTLE WA

11-2-35376-1

Rcpt. Date	Acct. Date	Time
10/12/2011	10/12/2011	01:41 PM

Receipt/Item #	Tran-Code	Docket-Code
2011-14-10298/01	1100	\$FFR

Cashier: RCF

**KING COUNTY SUPERIOR COURT  
CASE ASSIGNMENT DESIGNATION  
and  
CASE INFORMATION COVER SHEET  
(cics)**

Paid By: HOLLAND, DWIGHT  
Transaction Amount: \$230.00

In accordance with LR82(e), a faulty document fee of \$15 will be assessed to new case filings missing this sheet pursuant to King County Code 4.71.100.

CASE NUMBER: **11-2-35376-1 KNT**

CASE CAPTION: \_\_\_\_\_

I certify that this case meets the case assignment criteria, described in King County LR 82(e), for the:

\_\_\_\_\_ Seattle Area, defined as:

All of King County north of Interstate 90 and including all of the Interstate 90 right-of-way; all the cities of Seattle, Mercer Island, Bellevue, Issaquah and North Bend; and all of Vashon and Maury Islands.

✓ \_\_\_\_\_ Kent Area, defined as:

All of King County south of Interstate 90 except those areas included in the Seattle Case Assignment Area.

  
Signature of Petitioner/Plaintiff

\_\_\_\_\_  
Date

or

\_\_\_\_\_  
Signature of Attorney for  
Petitioner/Plaintiff

\_\_\_\_\_  
Date

\_\_\_\_\_  
WSBA Number

**KING COUNTY SUPERIOR COURT  
CASE ASSIGNMENT DESIGNATION  
and**

**CASE INFORMATION COVER SHEET**

Please check one category that best describes this case for indexing purposes. Accurate case indexing not only saves time but helps in forecasting judicial resources. A faulty document fee of \$15 will be assessed to new case filings missing this sheet pursuant to Administrative Rule 2 and King County Code 4.71.100.

**APPEAL/REVIEW**

- ☐ Administrative Law Review (ALR 2)\*  
☐ DOL Implied Consent—Test Refusal—only RCW 46.20.308 (DOL 2)\*  
☐ DOL- all other appeals (ALR 2) \*

**CONTRACT/COMMERCIAL**

- ☐ Breach of Contract (COM 2)\*  
☐ Commercial Contract (COM 2)\*  
☐ Commercial Non-Contract (COL 2)\*  
☐ Meretricious Relationship (MER 2)\*  
☐ Third Party Collection (COL 2)\*

**DOMESTIC RELATIONS**

- ☐ Annulment/Invalidity (INV3)\*  
     with dependent children? Y / N; wife pregnant? Y / N  
☐ Child Custody (CUS 3)\*  
☐ Nonparental Custody (CUS 3)\*  
☐ Dissolution With Children (DIC 3)\*  
☐ Dissolution With No Children (DIN 3)\*  
     wife pregnant? Y / N  
☐ Enforcement/Show Cause- Out of County (MSC 3)  
☐ Establish Residential Sched/Parenting Plan(PPS 3)\* \*\*  
☐ Establish Supprt Only (PPS 3)\* \*\*  
☐ Legal Separation (SEP 3)\*  
     with dependent children? Y / N; wife pregnant? Y / N  
☐ Mandatory Wage Assignment (MWA 3)  
☐ Modification (MOD 3)\*  
☐ Modification - Support Only (MDS 3)\*  
☐ Out-of-state Custody Order Registration (FJU 3)  
☐ Out-of-State Support Court Order Registration (FJU 3)  
☐ Reciprocal, Respondent Out of County (ROC 3)  
☐ Reciprocal, Respondent in County (RIC 3)  
☐ Relocation Objection/Modification (MOD 3)\*

**ADOPTION/PATERNITY**

- ☐ Adoption (ADP 5)  
☐ Challenge to Acknowledgment of Paternity (PAT 5)\*  
☐ Challenge to Denial of Paternity (PAT 5)\*  
☐ Confidential Intermediary (MSC 5)  
☐ Establish Parenting Plan-Existing King County Paternity (MSC 5)\*  
☐ Initial Pre-Placement Report (PPR 5)  
☐ Modification (MOD 5)\*  
☐ Modification-Support Only (MDS 5)\*  
☐ Paternity, Establish/Disestablish (PAT 5)\*  
☐ Paternity/UIFSA (PUR 5)\*  
☐ Out-of-State Custody Order Registration (FJU 5)  
☐ Out-of-State Support Order Registration (FJU5)  
☐ Relinquishment (REL 5)  
☐ Relocation Objection/Modification (MOD 5)\*  
☐ Rescission of Acknowledgment of Paternity (PAT 5)\*  
☐ Rescission of Denial of Paternity (PAT 5)\*  
☐ Termination of Parent-Child Relationship (TER 5)

**DOMESTIC VIOLENCE/ANTIHARASSMENT**

- ☐ Civil Harassment (HAR 2)  
☐ Confidential Name Change (CHN 5)  
☐ Domestic Violence (DVP 2)  
☐ Domestic Violence with Children (DVC 2)  
☐ Foreign Protection Order (FPO 2)  
☐ Vulnerable Adult Protection (VAP 2)

**\*\*** Paternity Affidavit or Existing/Paternity is not an issue and NO other case exists in King County\* The filing party will be given an appropriate case schedule.      **\*\*** Case schedule will be issued after hearing and findings.

**KING COUNTY SUPERIOR COURT  
CASE ASSIGNMENT DESIGNATION  
and**

**CASE INFORMATION COVER SHEET**

Please check one category that best describes this case for indexing purposes. Accurate case indexing not only saves time but helps in forecasting judicial resources. A faulty document fee of \$15 will be assessed to new case filings missing this sheet pursuant to Administrative Rule 2 and King County Code 4.71.100.

**PROPERTY RIGHTS**

- ☐ Condemnation/Eminent Domain (CON 2)\*
- ☐ Foreclosure (FOR 2)\*
- ☐ Land Use Petition (LUP 2)\*
- ☐ Property Fairness (PFA 2)\*
- ☐ Quiet Title (QTI 2)\*
- ☐ Unlawful Detainer (UND 2)

**JUDGMENT**

- ☐ Confession of Judgment (MSC 2)\*
- ☐ Judgment, Another County, Abstract (ABJ 2)
- ☐ Judgment, Another State or Country (FTJ 2)
- ☐ Tax Warrant (TAX 2)
- ☐ Transcript of Judgment (TRJ 2)

**OTHER COMPLAINT/PETITION**

- ☐ Action to Compel/Confirm Private Binding Arbitration (MSC 2)
- ☐ Certificate of Rehabilitation (MSC 2)
- ☐ Change of Name (CHN 2)
- ☐ Deposit of Surplus Funds (MSC 2)
- ☐ Emancipation of Minor (EOM 2)
- ☐ Frivolous Claim of Lien (MSC 2)
- ☐ Injunction (INJ 2)\*
- ☐ Interpleader (MSC 2)
- ☐ Malicious Harassment (MHA 2)\*
- ☐ Non-Judicial Filing (MSC 2)
- ☒ Other Complaint/Petition (MSC 2)\*
- ☐ Seizure of Property from the Commission of a Crime (SPC 2)\*
- ☐ Seizure of Property Resulting from a Crime (SPR 2)\*
- ☐ Structured Settlements (MSC 2)\*
- ☐ Subpoena (MSC 2)

**PROBATE/GUARDIANSHIP**

- ☐ Absentee (ABS 4)
- ☐ Disclaimer (DSC4)
- ☐ Estate (EST 4)
- ☐ Foreign Will (FNW 4)
- ☐ Guardian (GDN4)
- ☐ Limited Guardianship (LGD 4)
- ☐ Minor Settlement (MST 4)
- ☐ Notice to Creditors - Only (NNC 4)
- ☐ Trust (TRS 4)
- ☐ Trust Estate Dispute Resolution Act/POA (TDR 4)
- ☐ Will Only—Deceased (WLL4)

**TORT, MEDICAL MALPRACTICE**

- ☐ Hospital (MED 2)\*
- ☐ Medical Doctor (MED 2)\*
- ☐ Other Health Care Professional (MED 2)\*

**TORT, MOTOR VEHICLE**

- ☐ Death (TMV 2)\*
- ☐ Non-Death Injuries (TMV 2)\*
- ☐ Property Damage Only (TMV 2)\*

**TORT, NON-MOTOR VEHICLE**

- ☐ Asbestos (PIN 2)\*\*
- ☐ Implants (PIN 2)
- ☐ Other Malpractice (MAL 2)\*
- ☐ Personal Injury (PIN 2)\*
- ☐ Products Liability (TTO 2)\*
- ☐ Property Damage (PRP 2)\*
- ☐ Wrongful Death (WDE 2)\*
- ☐ Tort, Other (TTO 2)\*

**WRIT**

- ☐ Habeas Corpus (WHC 2)
- ☐ Mandamus (WRM 2)\*\*
- ☐ Review (WRV 2)\*\*

\* The filing party will be given an appropriate case schedule. \*\* Case schedule will be issued after hearing and findings.

L: forms/cashiers/cics  
Rev 01/05

FILED

11 OCT 12 PM 1:36

KING COUNTY  
SUPERIOR COURT CLERK  
SEATTLE, WA.

SEALED SUB

Superior Court of Washington  
County of King

In re: *Douglas Holland*

and *BR. Solutions*

Petitioner(s),

Respondent(s).

No. **11-2-35376-1 KNT**

Sealed Financial Source  
Documents  
(Cover Sheet)  
(SEALFN)  
Clerk's Action Required

**Sealed Financial Source Documents**

(List documents below and write "Sealed" at least one inch from the top of the first page of each document.)

- ☐ Income Tax records
- ☐ Pay Stubs
- ☒ Credit Card Statements *Sealed*
- ☒ Bank statements *Sealed*
- ☐ Checks or the equivalent
- ☐ Check registers
- ☐ Loan application documents
- ☐ Retirement plan orders
- ☒ Other *Sealed*

Submitted by:

*[Signature]*

**Notice:** The other party will have access to these financial source documents. If you are concerned for your safety or the safety of the children, you may redact (block out or delete) information that identifies your location.

Sealed Fin Source Doc (SEALFN) - Page 1 of 1  
WPF DRPSCU 09.0220 (6/2006) - GR 22(b)(8). (f)

Redacted per Local Rule 5.2



ATERSO01  
PO Box 1022  
Wixom MI 48393-1022  
CHANGE SERVICE REQUESTED



ER Solutions, Inc. 800 SW 39th St.  
PO Box 9004 -Renton, WA 98057  
Mon-Thu 6AM-7PM, Fri & Sat 6AM-3PM, Sun  
9AM-1PM PST

Date: 07/07/2011  
Creditor: Dish Network  
Client Account #: Redacted per Local Rule 5.2  
ERS Account #:

Principal:  
Total Balance:

F-37735289-F1 579279041



Dwight Holland  
19613 138Th Ave SE  
Renton WA 98058-7743

Dear Dwight Holland:

The records of Dish Network reflect that your account has an amount due of \$ You can pay your outstanding bill  
online at [www.dishnetwork.com](http://www.dishnetwork.com) to resolve this account or mail your payment to the following address: Dish Network, Dept  
0063, Palatine, IL 60055-0063.

If you are unable to remit the total amount due or have any questions pertaining to this account, please contact us by telephone at 877-371-3188 or by mail at 800 SW 39th St., Renton, WA 98057.

Sincerely,  
John Gordon, 877-371-3188  
Debt Collector

This is an attempt to collect a debt and any information obtained will be used for that purpose. This communication is from a debt collector.

Unless you notify this office within 30 days after receiving this notice that you dispute the validity of this debt or any portion thereof, this office will assume this debt is valid. If you notify this office in writing within 30 days from receiving this notice that you dispute the validity of this debt or any portion thereof, this office will obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. If you request this office in writing within 30 days after receiving this notice, this office will provide you with the name and address of the original creditor, if different from the current creditor.

SSATERSOOF1

Please detach the bottom portion of this letter and return it with your payment in the enclosed envelope.

Date: 07/07/2011  
Creditor: Dish Network  
Client Account #:  
ERS Account #: Redacted per Local Rule 5.2

Total Balance:  
Amount Enclosed: US \_\_\_\_\_

Make check payable to "Dish Network"

Dish Network  
DEPT 0063  
Palatine IL 60055-0063



825590974098517800117036

Exhibit A2

Dwight Holland  
325 Washington ave s.  
ste #332  
Kent, WA 98032

ER Solutions  
800 SW 39<sup>th</sup> st  
Renton, WA 98058

RE: Debt Validation Letter  
Date: July 19, 2011

To Whom it may concern,

This letter is not a refusal to pay, but a notice sent pursuant to the Fair Debt Collection Practices Act, 15 USC 1692g Sec. 809(b) that your claim is disputed and validation is requested.

This is not a request for 'verification' or proof of my mailing address, but a request for DEBT VALIDATION made pursuant to the above named Title and Section. I respectfully request that your offices provide me with competent evidence that I have any legal obligation to pay you.

Please provide me with the following:

What the money you say I owe is for.

Explain and show me how you specifically calculated the entire amount of what you say I owe.

Provide me with copies of any and all papers that show I agreed to pay what you say I owe to include original signatures.

Identify the original creditor.

If your offices are able to provide the proper documentation as requested, I will require at least 30 days after receipt to investigate this information and during such time all collection activity must cease and desist.

If your offices fails to respond to this validation request within 30 days from the date of your receipt, all references to this account must be deleted and completely removed from my credit files and a copy of such deletion request shall be sent to me immediately.

Additionally I would also like to request, In writing that no more telephone calls (no telephone contact) be made by your offices to my home, or to my place of employment, etc. If your offices attempt any more telephone communication with me, including but not limited to computer generated calls and calls or correspondence sent to or with any third parties, it will consider from this point forward as harassment. As I requested from your office by phone on July 15<sup>th</sup>, 2011 all future communication with me MUST be done in writing and sent to the address noted in this letter by USPS.

It would be advisable that you assure that your records are in order before I am forced to take litigation action. This is an attempt to correct your records; any information obtained shall be used for that purposes.

Respectfully,

By: \_\_\_\_\_

authorized representative

Sent by certified mail,





P.O. Box 30285  
Salt Lake City, UT 84130-0285

August 12, 2011



18654

Redacted per Local Rule 5.2

DWIGHT HOLLAND  
325 WASHINGTON AVE S # 332  
KENT, WA 98032-5767

Re: Your account number ending in  
Creditor: Capital One Bank (USA), N.A.

Regarding account for DWIGHT HOLLAND

Dear DWIGHT HOLLAND,

Recently you contacted us about increasing your credit limit. We're writing to let you know that, unfortunately, we were not able to approve the increase for the following reasons:

- A credit limit increase on your account is not currently available upon request

In accordance with our policy, our associates have little power to reverse this decision. Although we were unable to fulfill your request at this time, Capital One may periodically conduct account reviews and increase the credit lines of those who qualify. If your line is increased after a Capital One initiated review, we will notify you separately.

We regret any inconvenience and look forward to continuing to serve you. Thanks for being a Capital One® customer.

Sincerely,

Capital One

SEE REVERSE FOR ADDITIONAL IMPORTANT INFORMATION AND DISCLOSURES.

© 2011 Capital One. Capital One is a federally registered service mark. All rights reserved.

IFM\CL0696\MAIL\Y\CD000045\P\EC\O\Y\EC\PG-61769\QA-30738

#### EQUAL CREDIT OPPORTUNITY ACT

The federal Equal Credit Opportunity Act prohibits creditors from discriminating against credit applicants on the basis of race, color, religion, national origin, sex, marital status, age (provided the applicant has the capacity to enter into a binding contract); because all or part of the applicant's income derives from any public assistance program; or because the applicant has in good faith exercised any right under the Consumer Credit Protection Act. The federal agency that administers compliance with this law concerning this creditor is Office of the Comptroller of the Currency, Customer Assistance Group, 1301 McKinney St., Suite 3450, Houston, TX 77010-9050.



Exhibit A4

	Equifax	Experian	TransUnion
CAP ONE - Credit Card, Terms REV	Reported	Reported	Reported
	REVOLVING	REVOLVING	REVOLVING
Account Number			
Ownership	Individual	Individual	Individual Redacted per Local Rule 5.2
Date Open	01-2001	01-2001	01-2001
Balance Date	08-2011	08-2011	08-2011
Balance Amount			
Monthly Payment	Redacted per Local Rule 5.2	Redacted per Local Rule 5.2	
High/Limit			
Account Status	Pays account as agreed	This is an account in good standing	Paid or paying as agreed
Prior Delinquency			
Past Due Amount			\$0
Equifax [Comment: Credit card. Amount in H/C column is credit limit]			
Experian			
TransUnion			

	Equifax	Experian	TransUnion
CHASE/BEST BUY - Credit Card, Terms REV	Reported	Reported	Reported
	REVOLVING	REVOLVING	REVOLVING
Account Number			
Ownership	Individual	Individual	Individual Redacted per Local Rule 5.2
Date Open	04-2006	04-2006	04-2006
Balance Date	08-2011	08-2011	08-2011
Balance Amount			
Monthly Payment	Redacted per Local Rule 5.2		
High/Limit			
Account Status	Pays account as agreed	This is an account in good standing	Paid or paying as agreed
Prior Delinquency			
Past Due Amount			\$0
Equifax [Comment: Credit card. Amount in H/C column is credit limit]			
Experian			

*Exhibit AS*

Equifax  
P.O. Box 740241  
Atlanta, GA  
30374

RE: letter of dispute  
Dear Sir or Madam:

I recently obtained a copy of my credit report from your agency and found the following item(s) to be in error:

Item 1: I dispute the following corporation claims ER Solution, account number  
Redacted per Local Rule 5.2

This company has been sent a debt validation letter and has not respond with any  
validity of the debt as pursuant to [15 USC 1692g]

Item 2: If the following item is there, I dispute the following corporation claims WCI, no  
account number, payment status is noted as 'UNPAID'. I'm not aware of this  
corporation, to my knowledge I haven't done business with this corporation or any of its  
affiliates. And by the off chance I have done business and defaulted on any item, I  
wasn't notified at all, thus violating my rights pursuant to [15 USC 1692g]

Enclosed are copies of the debt validation letters to ER Solution AND WCI for your  
review. Please investigate this matter and make the necessary correction as soon as  
possible. This violation has caused me damage due to commerce.

Warm Regards

By: \_\_\_\_\_  
Dwight M. Holland

EXHIBIT A4

Experian  
P.O. Box 2002  
Allen, TX 785013

RE: letter of dispute  
Dear Sir or Madam:

I recently obtained a copy of my credit report from your agency and found the following item(s) to be in error:

Item 1: I dispute the following corporation claims ER Solution, account number

Account #

Redacted per Local Rule 5.2

Account Type: Collections

This company has been sent a debt validation letter and has not respond with any validity of the debt as pursuant to [15 USC 1692g]

Item 2: If the following item is there, I dispute the following corporation claims WCI, no account number, payment status is noted as 'UNPAID'. I'm not aware of this corporation, to my knowledge I haven't done business with this corporation or any of its affiliates. And by the off chance I have done business and defaulted on any item, I wasn't notified at all, thus violating my rights pursuant to [15 USC 1692g].

Additionally I just received a returned certified letter to the establishment above. This makes them a non-entity until otherwise established a legal address

Account # Unknown

Account Type: collections

Item 3: CAPITAL ONE

Account #

Redacted per Local Rule 5.2

Account Type: Credit Card

Balance: 0.00

Account Status: Closed

Please remove this account from my report as it has been closed and on my report for at least seven years. Thank you

Item 4: DSHS/DCS FIVE

Account #

Redacted per Local Rule 5.2

Account Type: Family Support

Account Status: Closed

Please remove this account from my report as it has been closed and on my report for at

least seven years. Thank you

Item 5: WEBBANK/DFS

Account #

Redacted per Local Rule 5.2

Account Type: Charge Account

Account Status: Closed

Please remove this account from my report as it has been closed and on my report for at least seven years. Thank you

Enclosed are copies of the debt validation letters to ER Solution AND WCI for your review. Please investigate this matter and make the necessary correction as soon as possible. This violation has caused me damage due to commerce.

Warm Regards

By: \_\_\_\_\_

Dwight M. Holland

*Exhibit A7*

Dwight Holland  
325 Washington ave s  
#332  
Kent, WA  
98032

Aug 2, 2011

Mr. John Gordon Debt Collector  
ER Solutions Inc  
800 SW 39<sup>th</sup> st  
P.O. Box 9004  
Renton, WA  
98057

RE: Letter of Intent to Sue  
Account #           Redacted per Local Rule 5.2

Mr. Gordon

This letter serves as the formal notice of my intent to file a lawsuit against ER Solutions.

It appears your establishment has violated my rights according to FDCPA and FCRA.  
On July 20, 2011 I have mail a debt validation letter – certified #7010 1670 0001 9579 2373 – to your place of business. The mail showed received, stamped and signed by an co-worked/employee Mark Saywers. As per law, your establishment must cease and desist all forms of collection activity, and provide the necessary documentation thus proving and providing the demand of said alleged debt.

Unfortunately this wasn't the case.

To my surprise not only did ER solution cease and desist its harassment, but it has stepped up its harassment tactics and caused further damage to me by placing negative information on my credit report. Thus causing me financial harm in my commerce business dealings.

This demands action for satisfaction and remedy. If you wish to resolve this mater without court action, within 15 days of the receipt of this letter, I'm willing to hear what you have to say to make me whole.  
However if I do not hear from you by the time alloted above (15) days, I will have not choice but to initial a litigation against ER Solutions.

Your utmost attention is appreciated.

By: \_\_\_\_\_

Dwight M. Holland

*Exhibit A8*



August 11, 2011

Dwight Holland  
325 Washington Ave S., Ste #332  
Kent, WA 98032

Re: Account # Redacted per Local Rule 5.2

We did receive your first notice dated 7-19-11 but were unable to locate an account for you since your name is quite common and without the correct address or account number listed. Since your second letter dated 8-2-11 had the account number, we were able to locate the account and it has since been closed and returned back to the original creditor Dish Network. This account has been deleted from the credit bureaus and attached is a copy of that deletion.

Thank you,

A handwritten signature in cursive script, appearing to read 'Lisa Burton'.

Lisa Burton  
ERS Client Service Manager  
206-287-5594

ER SOLUTIONS, INC.  
800 SW 39TH STREET • RENTON, WASHINGTON 98057  
TEL: 425.643.3111 • FAX: 206.322.4838 • [www.ConvergentERS.com](http://www.ConvergentERS.com)

Universal Data Form																																																																																															
AUD Correction Indicator: Update <input type="checkbox"/> Delete <input checked="" type="checkbox"/> Delete due to fraud <input type="checkbox"/>																																																																																															
Subscriber Name: BR Solutions						Equifax SC: 701YC00483																																																																																									
Subscriber Address: 800 SW 39th Street, Renton, WA 98055-4975						Experian SC: 0960304																																																																																									
Exhibit A9						Innovis SC:																																																																																									
						TU SC: 57XU001																																																																																									
<b>Consumer Information</b>																																																																																															
Last Name		First Name		Middle Name		Gen		SSN		DOB																																																																																					
HOLLAND		DWIGHT																																																																																													
Current Address				City				State		Zip+4																																																																																					
19613 138TH AVE SE				RENTON				WA		98058																																																																																					
Previous Last Name			Previous First Name			Previous Middle Name			Previous Gen																																																																																						
Previous Address				City				State		Zip+4																																																																																					
Consumer Information Indicator:				ECOA: 1				Phone:																																																																																							
<b>Employment Information</b>																																																																																															
Employer Name:						Occupation:																																																																																									
Current Address				City				State		Zip+4																																																																																					
<b>Associated Consumer Information</b>																																																																																															
Last Name		First Name		Middle Name		Gen		SSN		DOB																																																																																					
Current Address				City				State		Zip+4																																																																																					
Consumer Information Indicator:				ECOA:				Phone:																																																																																							
Last Name		First Name		Middle Name		Gen		SSN		DOB																																																																																					
Current Address				City				State		Zip+4																																																																																					
Consumer Information Indicator:				ECOA:				Phone:																																																																																							
<b>Account Information</b>																																																																																															
Account Number		Date Opened		Current Balance		Amount Past Due		Portfolio Type		Credit Limit																																																																																					
37735289		05-26-2011						O																																																																																							
Term Due/Freq		Date Closed		Actual Payment		Date of Last Payment		Account Status		Payment Rating																																																																																					
/								DA		43																																																																																					
Original Creditor Name				Creditor Classification		Mortgage Agency Identifier				Sec. Marketing Agency Id Account #																																																																																					
Purchased Portfolio or Sold Name				Portfolio Indicator		Deferred Payment Start Date				Balloon Payment Due Date																																																																																					
Mortgage Id #								AUD Control #		56533606																																																																																					
<b>Account History</b>																																																																																															
<table border="1" style="width:100%; border-collapse: collapse; text-align: center;"> <tr><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td></tr> <tr><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td></tr> <tr><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td></tr> <tr><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td></tr> <tr><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td></tr> <tr><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td></tr> <tr><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td></tr> </table>												-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-																																																																																				
-	-	-	-	-	-	-	-	-	-	-	-																																																																																				
-	-	-	-	-	-	-	-	-	-	-	-																																																																																				
-	-	-	-	-	-	-	-	-	-	-	-																																																																																				
-	-	-	-	-	-	-	-	-	-	-	-																																																																																				
-	-	-	-	-	-	-	-	-	-	-	-																																																																																				
-	-	-	-	-	-	-	-	-	-	-	-																																																																																				

Authorized Signature: Ashlee Fields  
Date: 08-09-2011

Tel: (206) 322-4500

By submitting this AUD, you certify that you have verified the accuracy of the data in compliance with all legal requirements, and your computer and/or manual records will be adjusted to reflect the changes noted.



*Exhibit A10*

Dwight M. Holland  
325 Washington avenue south  
Ste. #332  
Kent, WA  
98032

Lisa Burton – Debt collector  
ER Solutions, INC.  
800 SW 39<sup>th</sup> Street  
Renton, WA  
98057

Re: Account #: Redacted per Local Rule 5.2

In response to your letter dated Aug 11, 2011 which states:

1. My Letter dated 07/19/11 had no account number.
2. The name 'Dwight M. Holland' is a common name.

Leads me to believe, you're stating reasons to justify violating my rights under FDCPA, TCPA and RCW statutes.

However I'm at a lost, as I would think any reasonable person reading your letter would be. In the past, whenever I call your establishment, to discussed business, I never had to use my account number. As a matter of fact, your well trained specialist has located my account on numerous occasions just from my name alone, and managed to verify who I was, by simply asking me to verify my address. Two pieces of information that are on this and every letter I've sent your organization.

However I'm not writing you to discuss the methodologies and, bureaucracy employed and or practiced by ER Solutions. I'm writing to inform you of the various violations of my rights by your organization. In short Ms. Burton your organization has caused me great harm, and under Federal and State statutes, I have the right to restitution.

The constant and consistent phone calls I received from ER Solution were harassing and very annoying. They have hampered me from conducting my business, causing stress and interrupt my life as I go about it every day.

The derogatory mark to my credit file, has hampered me from conducting commerce, by reducing my overall credit score, and introduced unnecessary stress into my life, in which I had to contend with.



To expound on the points above, let me recap briefly on the events that led me to write this correspondence.

On 7/14/11 I have called and spoken with two of your staff, the latter being a manager. The content of the conversation were a verbal request, to cease phone calls and continue communication in writing. I was assured my request would be granted by the manager.

When my request went unanswered, by receiving additional phone calls, I have sent a letter of debt validation - dated 7/19/11, to your organization. The contents of the letter were plain and straight to the point. It requests the evidence of the debt, and to cease phone calls, and communicate with me in writing.

Unfortunately it appears both my requests verbally and written went unanswered, and apparently ignored. Additionally and maybe the most important of all, the debt validation letter, you received from me, at that moment of receipt, ER solution was obliged by law to cease all of its collection efforts until it could honor my request as stipulated by Federal Law. Again ER Solutions has failed to comply.

Ms. Burton, It doesn't appear to me ER Solutions was experiencing a slight administrative problem, you've eluded in regards to my account. What appears to me is ER Solutions thinks it is above the law.

Each call before and especially thereafter the letter dated 07/19/11 was recorded, robo-calls have been recorded, transcribed and logged, including the derogatory mark to my credit file.

ER solutions, with its collection activity has violated FDCPA on multiple occasions, with each violation carries a \$1000.00 fine.

To date, my count, are at least 15 - 20 occurrences if not more. Keep in mind it's been close to a month after you have received the Validation of debt letter dated 07/19/11.

\$15,000 ~ \$20,000

ER solution with its collection activity has violated TCPA on multiple occasion, and in it, each violation carries, a fine ranging between \$500 - \$1500 dollars - To date my count 10 - 15 occurrences.

\$5000 ~ \$15,000

Ms. Burton, I'm sure your time is valuable, and there are things you would otherwise be doing. Like you, my time is likewise, valuable, and I must account for that time, which I had to devote to resolve this situation, introduced by the negligence of your company.

ER Solution has placed me in the position to do its job/diligence to get it to cease its collection efforts according to law.

My rate for providing that service, is \$375.00 dollar/hr., and as of date, with phone calls to your establishment, phone recording captured and transcribed, letter typing, trips to the Post office, certification email etc. It comes to roughly 3.5 hours, which equates to \$1312 dollars - rounded off.

Itemizing the damages

FDCPA Fines	- \$15,000.00
TCPA Fines	- \$5,000.00
Services & supplies	- \$1,312.00
<b>Total</b>	<b>- \$21,312.00</b>

Please keep in mind the figure above is a conservative estimate and it does not involve the damages incurred to me by your establishment placing a derogatory mark to my credit file. However if I am force to seek restitution by other means ie: litigation, than by your cooperation, the figure will dramatically increase. As I can provide all dates, times, of calls, robo-calls transcriptions, made by ER Solutions, and furnish my credit score before the derogatory mark, and furnish the damage that it has done to me since.

Please remit a check in the amount of **\$21,312.00** dollars to

Dwight M. Holland  
325 Washington avenue south  
STE #332,  
Kent, WA  
98032

Enclosing, this is a second attempt to resolve this matter with you. You have ten business days to reply. If this letter and the claim go unanswered and or unsatisfied, I will have no choice but to initiate litigation to resolve this matter, where I will attempt to get full damages, as expressed under Law.

Thank you for your attention to this matter.

Warm Regards,

By: \_\_\_\_\_  
ALL RIGHTS RESERVE

Dwight M. Holland



# Your DISH Network Statement

DEPT 0063 PALATINE IL 60055-0063  
8255 8000 NO RP 07 04082010 YYYNYN 01 160490

DWIGHT HOLLAND  
325 WASHINGTON AVE S  
KENT WA 98032-5767

April 7, 2010

Page 1 of 3

Account Holder: DWIGHT HOLLAND  
Account Number: Redacted per Local Rule 5.2  
Service Address: 19613 138TH AVE SE  
RENTON WA 98058-7743

*Exhibit A4*



## Did you forget...

We have not received payment for your last statement. Please pay this amount immediately to avoid service interruption and additional late fees.



**Avoid missed payments with AutoPay.** Enroll in our free and convenient AutoPay with Paperless Billing program to save time and money and never pay a late fee again. Log into [www.dishnetwork.com/myaccount](http://www.dishnetwork.com/myaccount) to pay online or check the AutoPay and Paperless Billing boxes on the return portion of this billing statement.

Looking for ways to save each month? Call us at 1-888-337-3474 & let one of our customer service specialists review your account to find the best choices to fit your budget.

If you have made your payment within the past 7-10 days, thank you.

Services from 04/22/10 - 05/21/10

## Account Summary

Previous Balance	\$ 74.75
Current Charges	79.26
<b>Total Due Immediately</b>	<b>\$ 154.01</b>

See details on the back

## Contact Us

- Online: [dishnetwork.com/faq](http://dishnetwork.com/faq)
- Email: [care@dishnetwork.com](mailto:care@dishnetwork.com)
- Phone: 1-800-333-3474

▼ If paying by mail, detach here and send the bottom return portion with your payment in the enclosed envelope. ▼



## Payment Options

To pay for this month's bill:

- By check - Write your account number on your check and return this portion
- By credit/debit card -  
Go to [dishnetwork.com/myaccount](http://dishnetwork.com/myaccount)

To set up AutoPay with Paperless Billing:

- By check - Fill out the reverse side of this form
- By credit/debit card -  
Go to [dishnetwork.com/myaccount](http://dishnetwork.com/myaccount)

Account Holder: DWIGHT HOLLAND  
Account Number: Redacted per Local Rule 5.2  
Billing Address: 325 WASHINGTON AVE S  
KENT WA 98032-5767

**Total Due Immediately \$ 154.01**

Amount Enclosed: \$ \_\_\_\_\_

DISH NETWORK  
DEPT 0063  
PALATINE IL 60055-0063



825590974098517800154013



Exhibit A12

Citibank, N.A.  
Customer Service Center  
P.O. Box 6500  
Sioux Falls, SD 57117-6500

Congratulations!

Account Ending In:

August 30, 2011



Redacted per Local Rule 5.2

00010085 BB 10Z 242 BDF A8141 AM1 78

DWIGHT M HOLLAND  
325 WASHINGTON AVE S  
APT 332  
KENT WA 98032-5767

[www.citicards.com](http://www.citicards.com)

Dear DWIGHT M HOLLAND:

Why we're  
writing you

Here's what you  
need to know

Welcome! Your request for the Citi Platinum Select account has been approved with a credit limit of \$5,300. You should be receiving your new card(s) within 7 to 10 days from the date of this letter. If you do not receive your card(s) within this time frame, please call us immediately at 1-800-335-4112.

Enclosed is information about your new account. Please refer to the specific pricing terms beginning on the next page of this letter. This letter is part of the enclosed Card Agreement and should be kept for future reference. We hope this answers any questions you may have.

We are also enclosing a copy of our privacy notice. As a member of the Citigroup family of companies, we are committed to protecting the security of the business you do with us and will respect the privacy and confidentiality of your information at all times.

We've assigned a Personal Identification Number (PIN) to your card. You can find it in the highlighted box below. This PIN will enable you to use your card to obtain cash advances at ATMs worldwide. Additionally, you may obtain cash by presenting your card at many financial institutions.

Some important  
information

Your Citi Platinum Select account delivers exceptional value backed by superior quality and service.

Here are a few tips to maintain a good credit history:

- Pay at least the minimum payment due by the payment due date. Our Online Bill Payment service is also available. This free service allows you to pay your bill online and if your request is received by 5:00 p.m. ET, your payment will be credited to your account as of that day. To learn more about Online Bill Payment sign on to [www.citicards.com](http://www.citicards.com).
- Keep your balance below your credit limit.
- Notify us of any address or telephone number changes.

We value you as our new customer and appreciate the opportunity to meet your financial needs.

Sincerely,

Kendall E. Stork  
President and CEO  
Citibank, N.A.

Enclosure

0/L0/190001/001/ZZ/SY/ZP/8000/SYSTEMB/I2011083070110713/13785/13785/08

5

Redacted per Local Rule 5.2

Please keep this letter for future reference.  
It's easy to get cash with your new card.

Use your Personal Identification  
Number (PIN).

*Exhibit A12***dman**

---

**From:** "First National Bank of Omaha" <eService@online.fnni.com>  
**Date:** Thursday, September 01, 2011 8:04 AM  
**To:** <DMANH12@HOTMAIL.COM>  
**Subject:** Credit Card Application Approval  
First National Bank of Omaha

---

Welcome!

We have reviewed and approved your recent credit card application, reference number

Redacted per Local Rule 5.2

Thank you for opening a new credit card account. We're glad to have you as a cardholder. Your new card should arrive within 7 to 10 business days.

Once you receive your new card, enroll your card on our secure online site at [www.firstnational.com](http://www.firstnational.com) and activate your card on the 'Account Services' tab and then easily manage your account online anytime.

Until then, visit [www.firstnational.com](http://www.firstnational.com) to learn about the free online tools that are available to help manage your account.

- View transactions
- eStatements
- Free online payments
- Personalized credit cards

---

To ensure delivery of our emails to your inbox, please add eService@online.fnni.com to your address book.

Please do not reply to this email. If you have questions, please log in to First National Online at [www.firstnational.com](http://www.firstnational.com) and use the secure email function located in the Contact Us section of the website.

[Privacy Policy](#) | [Security Statement](#)

10/8/2011



FILED  
11 OCT 14 PM 1:19  
KING COUNTY  
SUPERIOR COURT CLERK  
SEATTLE, WA.

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
FOR KING COUNTY

DWIGHT HOLLAND  
Plaintiffs,

vs.

ER Solutions INC  
Defendants.

NO. 11-2-35376-1 KNT

SUMMONS BY  
PERSONAL SERVICE

The State of Washington To:  
Defendant(s)

ER Solutions INC  
Address: 800-860 39th STREET RAINIER, WA 98037

1. A lawsuit has been started against you in the above-entitled Court by the plaintiff.
2. Plaintiffs' claim is stated in written complaint, a copy of which is served upon you with this Summons.
3. In order to defend against this lawsuit you must respond to the Complaint by stating your defense in writing, and by serving a copy upon the person signing this Summons,  
☒ within twenty (20) days (if service is made on you within the State of Washington),  
or  
☐ within sixty (60) days (if service is made on you outside the State of Washington),  
after the date of service on you of this summons, or a default judgment may be entered against you without notice. A default judgment is one where the plaintiff is entitled to what he asked for because you have not responded.
4. If you serve a Notice of Appearance on the undersigned person, you are entitled to notice before default judgment may be entered.
5. If not previously filed, you may demand that the Plaintiff file this lawsuit with the court. If you do so, the demand must be in writing and must be served upon the person signing this

1 summons. Within 14 days after you serve the demand, the Plaintiff must file this lawsuit with  
 2 the court, or the service on you of this summons and complaint will be void.

3 6. If you wish to seek the advice of an attorney in this matter you should do so promptly so that  
 4 your written response, if any, may be served on time.

5 7. This summons is issued pursuant to Civil Rule 4 for the Superior Court of the State of  
 6 Washington.

7 DATED this 13<sup>th</sup> day of October, 2011.

8 By: [Signature]  
 9 Signature

10 DWIGHT HOLCAND

11 Typed Name

12 Address: 325 Washington Ave. S.  
 13 STE 332, Kent, WA 98032

FILED

11 OCT 14 PM 1:18

KING COUNTY  
SUPERIOR COURT CLERK  
SEATTLE, WA.SUPERIOR COURT OF WASHINGTON FOR King COUNTYDwight Holland Plaintiff,

Vs.

E.R. Solutions Defendant,NO. 11-2-35376-1 KNT

AFFIDAVIT OF SERVICE

The undersigned, being first duly sworn, on oath deposes and says: That he is now and at all times herein mentioned was a citizen of the United States and resident of the State of Washington, over the age of twenty-one years, not a party to or interested in the above untitled action and competent to be a witness therein:

That on the 13<sup>th</sup> day of Oct, 2011, at 9<sup>16</sup> am, at the address of 800 Sw 39<sup>th</sup> St. Kent, WA, Washington, this affiant duly served a Summons And Complaint in the above entitled action upon E.R. Solutions, defendant therein named, by then and there personally delivering a true and correct copy thereof into the hands of and leaving same with said FLAVIA D.

That on the 13<sup>th</sup> day of Oct, 2011, at \_\_\_\_\_ m., at the address of 800 Sw 39<sup>th</sup> St. Kent, WA within, King County, Washington, this affiant duly served a Summons And Complaint in the above entitled action upon E.R. Solutions defendant therein named, by then and there personally delivering a true and correct copy thereof of same for said defendant at residence and usual place of abode by delivering into the hands of and leaving with, a person who claimed to be FLAVIA D., being a person of suitable age and discretion, then resident therein.

Affiant further states that he is informed and believes and therefore alleges, that neither of said defendants is in the military service of the United States.

Subscribed and sworn to before me this 13<sup>th</sup> day of October, 2011.

MARIA M. LIM  
Notary Public  
State of Washington  
My Commission Expires  
April 14, 2014

[Signature]  
Notary Public in and for the State of  
Washington, residing at King County

Affidavit of Service

1



FILED

11 OCT 21 PM 2:09

THE HONORABLE JAMES C. WHITE  
SUPERIOR COURT CLERK  
E-FILED

CASE NUMBER: 11-2-35376-1 KNT

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF KING

DWIGHT HOLLAND,

Plaintiff,

v.

ER SOLUTIONS,

Defendant.

Cause No.: 11-2-35376-1 KNT

NOTICE OF APPEARANCE

PLEASE TAKE NOTICE that Defendant, ER Solutions, Inc., by and through its attorneys Cozen O'Connor, without waiving any defenses, including objections as to improper service or jurisdiction, hereby enter their appearance through the undersigned attorneys. Service of all other further pleadings, notices, documents or other papers herein, exclusive of original process, may be had upon said Defendant by serving the undersigned attorneys of record at the address below stated.

Dated: October 21, 2011

COZEN O'CONNOR

By: /s/ Benjamin J. Stone

Benjamin J. Stone, WSBA No. 33436  
1201 Third Avenue  
Suite 5200  
Seattle, Washington 98101  
Telephone: 206.340.1000  
Toll Free Phone: 800.423.1950  
Facsimile: 206.621.8783  
Attorneys for Defendant

NOTICE OF APPEARANCE - 1

LAW OFFICES OF  
**COZEN O'CONNOR**  
A PROFESSIONAL CORPORATION  
1201 THIRD AVENUE  
SUITE 5200  
SEATTLE, WASHINGTON 98101-3071  
(206) 340-1000

**CERTIFICATE OF SERVICE**

The undersigned certifies under penalty of perjury under the laws of the State of Washington that I caused the foregoing document to be electronically filed with the Clerk of the Court:

1. Notice of Appearance.  
and was served upon the interested parties stated below in the manner so indicated:

**Plaintiff**

Dwight M. Holland  
C/O  
325 Washington Ave. South  
Ste. #332  
Kent, WA 98032

☐ HAND DELIVERY  
☒ US MAIL – FIRST CLASS POSTAGE  
☐ FACSIMILE  
☐ OVERNIGHT MAIL  
☐ EMAIL  
☐ ELECTRONIC FILING

DATED this 21<sup>st</sup> day of October, 2011.

COZEN O'CONNOR

By: /s/ Marcella Stone  
Marcella Stone, Legal Assistant to  
Benjamin J. Stone

SEATTLE\1220435\1 099994.000

NOTICE OF APPEARANCE - 2

LAW OFFICES OF  
**COZEN O'CONNOR**  
A PROFESSIONAL CORPORATION  
1201 THIRD AVENUE  
SUITE 5200  
SEATTLE, WASHINGTON 98101-3071  
(206) 340-1000